



Order Filed on June 18, 2019
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)
McGovern Legal Services, LLC
By: Marlena S. Diaz-Cobo, Esq.
850 Carolier Lane
North Brunswick, NJ 08902
(732) 246-1221
Attorneys for Sixty Acre Reserve Condominium
Association, Inc.

In Re:

ANDREA LEE MERCER

Case No.: 18-30940

Judge: Christine M. Gravelle

Chapter: 13

CONSENT ORDER RESOLVING CREDITOR'S MOTION FOR STAY RELIEF

The relief set forth on the following pages, numbered one (1) through four (4) is hereby **ORDERED**.

DATED: June 18, 2019

A handwritten signature in cursive script, reading "Christine M. Gravelle", is written over a horizontal line.

Honorable Christine M. Gravelle
United States Bankruptcy Judge

McGOVERN LEGAL SERVICES, LLC
BY: MARLENA S. DIAZ-COBO, ESQ.
850 CAROLIER LANE
NORTH BRUNSWICK, NEW JERSEY 08902
(732) 246-1221
ATTORNEYS FOR SIXTY ACRE RESERVE CONDOMINIUM ASSOCIATION, INC.

In re: UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
IN PROCEEDINGS UNDER CHAPTER 13
OF THE BANKRUPTCY CODE

ANDREA LEE MERCER

CASE NO.: 13-30940-CMG

Debtor.

CONSENT ORDER

CONSENT ORDER RESOLVING CREDITOR'S MOTION FOR STAY RELIEF

THIS MATTER having been brought before the court by McGovern Legal Services, LLC, attorneys for creditor, Sixty Acre Reserve Condominium Association, Inc. (the "Association"), by way of a Motion for Stay Relief and the parties having consented to the relief set forth herein, and for good cause shown and no cause to the contrary appearing;

IT IS ORDERED, ADJUDGED AND DECREED THAT the Debtor is indebted to the Association in the amount of \$2,669.00 in post-petition maintenance fees, late fees and attorneys' fees related to the Association's attempts to collect unpaid post-petition fees through June 17, 2019 (the "Total Due"). The Total Due is detailed below:

Maintenance Fees:	\$1,716.00
Late Fees:	\$45.00
<u>Legal (work related to post-petition default through 06/17/19):</u>	<u>\$908.00</u>
Total:	\$2,669.00

IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT the Debtor hereby acknowledges and agrees to pay the Total Due to the Association by certified check made payable to Sixty Acre Reserve Condominium Association, Inc. and received by McGovern Legal Services, LLC, 850 Carolier Lane, North Brunswick, NJ 08902 on the following schedule:

\$440.00 on or before June 28, 2019; and
\$220.00 on or before July 1, 2019; and
\$220.00 on or before August 1, 2019; and
\$220.00 on or before September 1, 2019; and
\$220.00 on or before October 1, 2019; and
\$220.00 on or before November 1, 2019; and
\$221.00 on or before December 1, 2019; and

IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT the Association shall be paid a secured claim in the amount of \$908.00 through the Debtor's Plan to satisfy the remaining balance of the Total Due.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT the Debtor shall maintain her post-petition assessments and other post-petition obligations as they become due and owing to the Association commencing on July 1, 2019; and

IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT if the Debtor fails to make the immediate payment specified above or fails to make any regular monthly payment or the additional monthly cure payment within thirty (30) days of the date the payments are due, then the Association may obtain an Order Vacating the Automatic Stay as to the Collateral by filing, with the Bankruptcy Court, a Certification specifying the Debtor's failure to comply with this order. At the time the Certification is filed

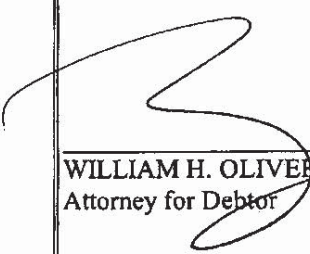
with the court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtor, and the Debtor's attorney.

**WE HEREBY CONSENT TO THE FORM
AND ENTRY OF THIS CONSENT ORDER:**

McGovern Legal Services, LLC
Attorneys for Sixty Acre Reserve Condominium Association, Inc.


MARLENA S. DIAZ-COBO, ESQ.

6/18/19
DATE


WILLIAM H. OLIVER, JR., ESQ.
Attorney for Debtor

DATE

Certificate of Notice Page 5 of 5
United States Bankruptcy Court
District of New Jersey

In re:
Andrea Lee Mercer
Debtor

Case No. 18-30940-CMG
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-3

User: admin
Form ID: pdf903

Page 1 of 1
Total Noticed: 1

Date Rcvd: Jun 19, 2019

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jun 21, 2019.

db +Andrea Lee Mercer, 710 Bluebell Drive, Jackson, NJ 08527-4113

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jun 21, 2019

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on June 19, 2019 at the address(es) listed below:

Albert Russo docs@russotrustee.com
Marlena S. Diaz-Cobo on behalf of Creditor Sixty Acre Reserve Condominium Association, Inc.
collections@theassociationlawyers.com
Rebecca Ann Solarz on behalf of Creditor BAYVIEW LOAN SERVICING, LLC. rsolarz@kmlawgroup.com
U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov
William H. Oliver, Jr. on behalf of Debtor Andrea Lee Mercer bkwoliver@aol.com,
R59915@notify.bestcase.com

TOTAL: 5